

STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • David A. Shorr, Director

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MAR 18 1997

PERMITTING & COMPLIANCE BRANCH  
(PPCB)

Kansas City Regional Office

500 NE Colbern Road

Lee's Summit, MO 64086-4710

(816)554-4100

FAX (816)554-4142

January 29, 1997

Mr. Scott D. Neuman  
K.C. Booth Company  
1760 Burlington  
North Kansas City, MO 64116

RE: Compliance Outreach Inspection Conducted January 22, 1997

Dear Mr. Neuman:

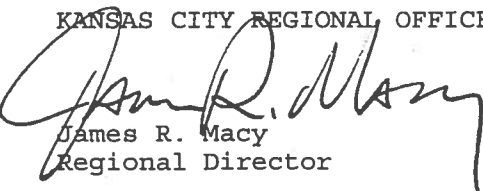
Enclosed is a copy of the Inspection Record and Checklist for the Compliance Outreach Inspection conducted at K.C. Booth Co., located in North Kansas City, Missouri. The enclosure is based on the January 22, 1997, inspection and is believed to be self-explanatory.

The department encourages correction of the violations noted on the checklist in a timely manner. It was discovered during the inspection that K.C. Booth Co., is registered as a small quantity generator but should be registered as a conditionally exempt small quantity generator. A notification of regulated waste activity form was left with Mr. Neuman at the time of the inspection. Hazardous Waste is shipped off site by Safety Kleen at least quarterly in a 30-gallon drum.

Should you have any questions or need further assistance, please contact the Technical Assistance Program at 1-800-361-4827.

Sincerely,

KANSAS CITY REGIONAL OFFICE

  
James R. Macy  
Regional Director

JRM/jbg

Enclosures

c: Ms. Kathy Flippin, Hazardous Waste Program  
Technical Assistance Program

Clay County  
K.C. Booth Co.  
H:\JAB\KCBOOTH.COV

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HAZARDOUS WASTE PROGRAM  
MISSOURI DEPARTMENT OF  
NATURAL RESOURCES





MISSOURI DEPARTMENT OF NATURAL RESOURCES  
HAZARDOUS WASTE PROGRAM  
SMALL QUANTITY GENERATOR  
**INSPECTION RECORD AND CHECKLIST**

RECEIVED

SEP 04 1997

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SQG-INSP.

ONLY FOR FACILITIES THAT GENERATE/ACCUMULATE < 1000 Kg (2,200 lbs) or approximately 5 drums			
FACILITY NAME K. C. Booth Mfg. Co.		DATE 1/22/97	DEPARTMENTAL NUMBER 0985822386
ADDRESS 1760 Burlington		RR NO.	MO I.D. NUMBER 022577
CITY North Kansas City	NUMBER OF EMPLOYEES	YEARS AT SITE	TELEPHONE NUMBER (816) 471-1921
FACILITY REPRESENTATIVE(S), TITLE(S) Scott Neuman, National Sales Manager			

**DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT**

Facility manufactures Booths for restaurants

Facility evaluated as HESQG - Conditionally Exempt  
Small Quantity Generator

Registered as SQG.

Facility glues laminants and other wood products  
together

**WASTE STREAMS**

	DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
1.	Waste Paint Related Material	7 gal per month	D001 F003 F005	Safety Kleen
2.				
3.				
4.				

**CHECK ALL THAT APPLY (Specify if possible)**

☐ NPDES Permit ☐ Lead/Acid Batteries ☐ POTW  
☐ Solid Waste Landfill

# A. GENERAL

<input checked="" type="checkbox"/>	Registered as a HW Generator - Section 260.380.1(1), RSMo and 10 CSR 25-5.262 (2)(A)	GGR
<input checked="" type="checkbox"/>	Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11	GGR
<input checked="" type="checkbox"/>	Utilizes a licensed hazardous waste transporter - Section 260.380.1 (5) RSMo	GGR
<input checked="" type="checkbox"/>	Utilizes authorized HW TSD or RR facility - ction 260.380.1(7), RSMo	GGR
<input checked="" type="checkbox"/>	Facility does not operate as a TSD - Section 260.390(1) RSMo	GGR

COMMENTS  
- Registered as SQG, but should be CESQG

## PART 1: WALK-THROUGH INSPECTION

# B. PRETRANSPORT, CONTAINERIZATION & STORAGE

<input checked="" type="checkbox"/>	Storage does not exceed 180 days (270 days if transported > 200 miles) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11(a)	GGR
<input checked="" type="checkbox"/>	Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.176	GPR
<input checked="" type="checkbox"/>	Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.176	GPR
<input checked="" type="checkbox"/>	Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.176	GPR
<input checked="" type="checkbox"/>	Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.176	GPR
<input checked="" type="checkbox"/>	Containers of ignitable or reactive waste stored > 50 ft. from property line (or meet requirements) - 10 CSR 25-5.262 (2)(C)6, referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265 (2)(1)2	GOR
<input checked="" type="checkbox"/>	Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262 (2)(C)1.	GOR
<input checked="" type="checkbox"/>	Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2)	GPT
<input checked="" type="checkbox"/>	Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2, (II) D	GOR
<input checked="" type="checkbox"/>	Containers clearly marked "hazardous waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3)	GPT
<input checked="" type="checkbox"/>	Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2, (II) C referencing 40 CFR 265.174	GPT
<input checked="" type="checkbox"/>	Daily inspection of areas subject to spills, i.e. waste handling areas - 10 CSR 25-5.262(2)(C)2, (II) C referencing 40 CFR 265.174	GOR
<input checked="" type="checkbox"/>	Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.35	GPT
<input checked="" type="checkbox"/>	Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33	GPT
<input checked="" type="checkbox"/>	"No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2, (II) F	GOR
<input checked="" type="checkbox"/>	Waste oil containers in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR

COMMENTS  
- 1st shipment of hazardous waste was 8/27/93. 2nd shipment of waste was 7/25/96. Exceeds 180 days.

- Evaluated as CESQG

#1



# C. SATELLITE ACCUMULATION

<input checked="" type="checkbox"/>	Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(1) referencing 40 CFR 265.176	GPT
<input checked="" type="checkbox"/>	Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.176	GPT
<input checked="" type="checkbox"/>	Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.176	GPR
<input checked="" type="checkbox"/>	Quantities accumulated not exceeding 55 gal. (1 quart of acutely hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)	GPT
<input checked="" type="checkbox"/>	Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(3)	GPT
<input checked="" type="checkbox"/>	Container marked identifying contents & beginning date - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(4)	GOR

COMMENTS  
- No Satellite accum.

7. <input checked="" type="checkbox"/> Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.	GOR	COMMENTS
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#### D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES

1. <input checked="" type="checkbox"/> Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.31		COMMENTS
2. <input type="checkbox"/> Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) and properly tested and maintained - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34 (d)(4) referencing 40 CFR 265 Subpart C.	GPT	<i>Evaluated as CESQG</i>
3. <input type="checkbox"/> Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(d)	GPT	
4. <input type="checkbox"/> Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.33	GPT	
5. <input type="checkbox"/> Emergency coordinator's name and phone number posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
6. <input type="checkbox"/> Telephone number of fire department posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
7. <input type="checkbox"/> Location of fire extinguisher and spill control equipment posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
8. <input type="checkbox"/> Employees familiar with waste handling and emergency procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(iii)	GSQ	
9. <input type="checkbox"/> Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)	GPT	
10. <input checked="" type="checkbox"/> Telephone or two-way radio onsite and capable of summoning local fire or police dept. - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(b)	GPT	

#### E. SQG TANKS

TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
2.				
3. <i>NA</i>				

<p>1. <input type="checkbox"/> All tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)</p> <p>2. <input type="checkbox"/> All tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)</p> <p>3. <input type="checkbox"/> All tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)</p> <p>4. <input type="checkbox"/> All tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)</p> <p>5. <input type="checkbox"/> All tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)</p> <p>6. <input type="checkbox"/> All tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)</p> <p>7. <input type="checkbox"/> All tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)</p> <p>8. <input type="checkbox"/> All tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)</p> <p>9. <input checked="" type="checkbox"/> Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)</p>		COMMENTS
		<i>No tanks on site</i>

10. <input checked="" type="checkbox"/> Inspection of waste feed cut off, bypass system, monitoring data and freeboard each operating day - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)	GPT	COMMENTS
11. <input type="checkbox"/> Weekly inspection of confinement structure, construction materials and general area for leaks, corrosion or discharges - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)5	GPT	
12. <input checked="" type="checkbox"/> Waste oil tanks in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR	

## PART 2: RECORDS INSPECTION

### F. MANIFESTS

Activity in the manifest system or waste is shipped under contractual agreement - 10 CSR 25-5.262(2)(B)1	GMR	COMMENTS
2. <input checked="" type="checkbox"/> Generator maintains a copy of the contractual agreement on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(e)(2)	GMR	
3. <input checked="" type="checkbox"/> Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)	GRR	
4. <input checked="" type="checkbox"/> Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(2)(B)	GOR	
5. <input type="checkbox"/> Manifest document, ID and <u>consecutive shipment numbers</u> - 10 CSR 25-5.262(2)(B)2.A	GOR	- no consecutive shipment numbers
6. <input checked="" type="checkbox"/> Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)1.	GMR	
7. <input checked="" type="checkbox"/> All transporters' names, phone numbers, license plate #s, MO & EPA I.D.#'s - 10 CSR 25-5.262(2)(B)2.	GMR	
8. <input checked="" type="checkbox"/> Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)2.E.	GMR	
9. <input checked="" type="checkbox"/> DOT shipping name, Hazard Class and waste I.D. # (RQ - if required) - 10 CSR 25-5.262(2)(B)2.	GMR	
10. <input checked="" type="checkbox"/> Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)(B)2.	GMR	
<input checked="" type="checkbox"/> Manifest signed and dated - 10 CSR 25-5.262(2)(B)1.	GMR	
<input type="checkbox"/> Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A	GOR	- consecutive shipment numbers
13. <input checked="" type="checkbox"/> Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1	GOR	
14. <input checked="" type="checkbox"/> Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C	GRR	
15. <input type="checkbox"/> Summary Manifest Reports and manifest copies sent to DNR quarterly - 10 CSR 25-5.262(2)(D)1	GOR	- no t.f. sent by Department that reports not on file.
16. <input checked="" type="checkbox"/> Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	
17. <input checked="" type="checkbox"/> "Land-Ban" notification/certification sent with manifests or with 1st shipment under a tolling agreement & retained on-site for 5 years - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	
18. <input checked="" type="checkbox"/> Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	

### G. PREPAREDNESS AND PREVENTION

1. <input checked="" type="checkbox"/> Arrangements with local emergency agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37	GPT	COMMENTS
2. <input checked="" type="checkbox"/> Emergency coordinator(s) on premise or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(i)	GSQ	

### H. WASTE OIL

Waste oil is managed properly and not disposed or transferred off-site - 10 CSR 25-11.010(4)(C)	GOR	COMMENTS
3. <input type="checkbox"/> Registered as waste oil generator if gen./accum. 220 lb. - 10 CSR 25-11.010(2)(A)	GOR	
4. <input type="checkbox"/> Written waste oil contract maintained - 10 CSR 25-11.010(4)(C)	GOR	
5. <input checked="" type="checkbox"/> Uses a licensed transporter and receiving facility - 10 CSR 25-11.010(4)	GOR	No Used oil



# I. RESOURCE RECOVERY

## COMMENTS

2. <input checked="" type="checkbox"/> Still bottom of RR under disposal property Section 259.832 (5) RSMo	GOR
3. <input checked="" type="checkbox"/> Facility is classified as U, R1, or R2 accurately - 10 CSR 25-9.020(3)(A)	GOR
4. <input checked="" type="checkbox"/> Facility meets the operating conditions of certification - 10 CSR 25-9.020(3).	GOR
5. <input checked="" type="checkbox"/> Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E)1 and 2.	GOR
6. <input checked="" type="checkbox"/> Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.	GOR
7. <input checked="" type="checkbox"/> Facility maintains a complete written operating record - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) and (2) as modified by 10 CSR 25-7.264(2)(E)2.	GOR
8. <input checked="" type="checkbox"/> Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103.	GOR

No Resource Recovery

## CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN

Facility utilizes water borne products that do not have to be disposed of as Hazardous waste. Cleanup is not necessary any more on some of the products, significantly reducing the amount of Hazardous waste.

INSPECTOR'S SIGNATURE

*Joshua Burke*

DATE

1/22/97